



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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SDMS DocID 2041955

April 2, 2003

Michael Christie, P.G.
Vice President
Penn E&R
2755 Bergey Road
Hatfield, PA 19440

Dear Mr. Christie:

This letter is in reference to the *Remedial Action Report for the Cinder/Slag Fill Area* located on Liberty Property Trust's 2301 Renaissance Boulevard Property, submitted to EPA by Penn E&R on August 29, 2002 for the Crater Resources Site ("Site"). The submittal was prepared by Penn Environmental and Remediation ("Penn E&R") on behalf of Liberty Property Limited Partnership and Liberty Property Trust (collectively "LPT") pursuant to the Unilateral Administrative Order for the Crater Resources Superfund Site. The selected remedy for the Cinder Slag Fill Area ("CSFA") is removal for contaminated materials and soils.

1. Section 2.3, page 2-2, item #8: Rather than "not applicable" a statement indicating that O&M activities are not required due to the complete removal of soils and the subsequent construction of the parking lot over the area, as well as reference to Section 7.0 of the Remedial Action Report should be included.
2. Section 2.3, page 2-2, item #9: A statutory Five Year Review will be required, since the remedial action left hazardous substances on the Site at levels that do not allow for unlimited use and unrestricted exposure. Unlimited use and unrestricted exposure means that there are no restrictions placed on the potential use of the land.
3. Table 9; page 5-8, last paragraph; page 5-9, 1st line: During the CSFA review, EPA estimated exposure point concentrations of 3.7 mg/kg for arsenic and 0.37 mg/kg for benzo[a]pyrene, with a total oral cancer risk for the construction worker of 3.4E-7, a total inhalation risk of 3.3E-8, a total dermal risk of 1E-8, and a total cancer risk of 5E-7. This is not greatly different from the report's total cancer risk of 3E-7 and remains below 1E-6. For the industrial worker, EPA estimated a total oral cancer risk of 1.5E-6, total inhalation cancer risk of 1.3E-6, total dermal risk of 1E-7, and total cancer risk of 3E-6, which is close to the report's total of 2.5E-6. This comment does not change the overall conclusions of the report
4. Page 5-11, 3rd paragraph; page 5-13, 2nd paragraph: The PADEP soil-to-groundwater MSC may be based on the old arsenic MCL of 50 ug/l, and may therefore not be relevant.
5. Page 5-11, 3rd paragraph, last sentence; page 5-13, 2nd paragraph, last sentence: Because arsenic is above the SSL but within background levels, the last sentence should probably use the rationale, "does not believe arsenic is elevated above background concentrations."

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6. Section 5.3.4: The last two sentences of this section should read: "The soils remaining in the CSFA do not present an unacceptable risk to construction or industrial office workers on the site, and leaching of potential site-related contaminants to the ground water at unacceptable concentrations is not expected to occur. Based on these results, no further investigation or remediation of the CSFA is warranted or required, provided institutional controls prevent residential use unless a residential risk assessment is performed."

7. Section 7, 3rd sentence: Instead of "will not occur," preferable wording is, "is not expected to occur."

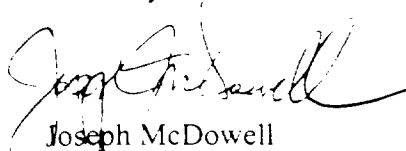
8. Table 4: Dermal toxicity factors should be shown also (they are the same as the oral factors for these two chemicals).

9. Table 8: The table headers should read "Noncarcinogenic" rather than "Carcinogenic." During the CSFA review, I estimated exposure point concentrations of 3.7 mg/kg for arsenic and 0.37 mg/kg for benzo[a]pyrene. Benzo[a]pyrene does not have noncancer toxicity factors, so the HI is entirely due to arsenic, with an oral HI for the construction worker of 0.04, dermal HI of 8E-4, and total HI of 0.04. (The report's total of 3.25E-7 is obviously the cancer risk, not the HI.) In any case, the total HI is below 1. For the industrial worker, I estimated an oral HI of 6E-3, dermal HI of 3E-4, and total HI of 6E-3. (The report's total of 2.5E-6 is obviously the cancer risk, not the HI.) In any case, the total HI is below 1.

10. Section 6.2, pages 6-2 and 6-3: Was analyses for total particulates performed for activities conducted on September 26, 2001? The text indicates this was conducted and the chain-of-custody indicates this was requested; however, results are not reported.

Please contact me at (215) 814-3192 should you have any questions or comments on this matter.

Sincerely,



Joseph McDowell
Remedial Project Manager

cc: A. Duchovnay (EPA)
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